

PELUSO & TOUGER, LLP
70 LAFAYETTE STREET
NEW YORK, NEW YORK 10013
PelusoandTouger.com

Ph. No. (212) 608-1234
Fax No. (212) 513-1989

BY ECF:
May 16, 2022
Honorable Loretta A. Preska
United States District Court Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Albert Lucas,
19 Cr 291 (LAP)

Your Honor,


I am writing on behalf of the defendant, Albert Lucas, who as the Court is aware, is released on a \$150,000.00 Bond, co-signed by two financially responsible people and is not allowed to travel outside of the SDNY and EDNY. Since his release from custody Mr. Lucas has fulfilled all his pre-trial release requirements and is currently employed. Mr. Lucas' Sentence Date is currently scheduled for June 29, 2022. I am writing to most respectfully request that the Court allow him to travel to Costa Rica from June 2nd - June 8th. He will be staying there at an Air BNB location: Calle 78 Apto 705, San José, San José 10101, Costa Rica. He is making this trip to celebrate his engagement and will be traveling with his fiancé. I have contacted the Government and they have no objection as long as the two cosigners to his Bond, Grace Lucas and Kemi Lucas provide a written notice that they have been informed about the trip and have no objection to Mr. Lucas being allowed to take the trip. I will provide the Court with the written documentation if the Court authorizes the requested travel. Also, upon authorization of the trip, most respectfully if the Court would authorize Pre-Trial Services to release to Mr. Lucas his passport so he can travel with it.

Thus, I would respectfully request that the Court, with the Governments consent, grant the above request, allowing Mr. Lucas to travel to Costa Rica from June 2nd to June 8th. Thank you very much for your consideration of this matter.

Respectfully yours,


David Touger

SO ORDERED


LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

5/16/22